

Patent Application  
Docket No. P13837US2

**DRAWING AMENDMENT**

Please replace the current drawings with the drawings presented on the enclosed replacement sheets.

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### REMARKS

Applicants thank the Examiner for his report. Reconsideration and allowance of the application is respectfully requested in view of the following remarks. Claims 1 - 37 are currently pending in the application. Please, cancel claims 16 and 25-31 without prejudice to the Applicant.

#### Drawing Rejection

Drawings were rejected. Corrected drawings are hereby provided. Therefore, Applicant respectfully requests withdrawal of the rejection.

#### Claim rejections – 35 U.S.C § 112

Claim 1 is rejected under 35 U.S.C § 112 as being indefinite. The Applicant has amended the application to clearly mention that the first trigger is received at the service manager at a first moment and the trigger is received at the service manager at a subsequent second moment. Therefore, the Applicant considers that the scope of protection sought is different than what has been interpreted by the Examiner given the unclearness of the claim as filed.

Claim 1 is now directed to a method of providing telecommunications services comprising the steps of, in a service manager, receiving a first trigger from a call server in response to occurrence of a first call event linked to the first trigger and subsequently, in the service manager, receiving a second trigger from the call server in response to occurrence of a second call event linked to the second trigger. Following reception of the first and the second triggers in the service manager, the method follows with the steps of performing a service interaction management analysis and determining if at least one application should be executed. If it is determined that at least one application should be executed, the method continues with a step of invoking by the service manager the at least one application via an application-programming interface.

#### Claim rejections – 35 U.S.C § 102(e)

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Claims 1-3, 5, 6, 8-11, 14, 15, 17, 19-22, 32-34 and 37 are rejected as being anticipated by Deo et al. (US 6,393,481) herein after referred to as Deo. The Applicant respectfully traverses the rejection. As mentioned earlier, claim 1 has been amended to clarify the scope of protection sought. Likewise, independent claims 17 and 32 were also amended.

Claim 1 is now directed to a method of providing telecommunications services comprising the steps of, in a service manager, receiving a first trigger from a call server in response to occurrence of a first call event linked to the first trigger and subsequently, in the service manager, receiving a second trigger from the call server in response to occurrence of a second call event linked to the second trigger. **Following reception of the first and the second triggers in the service manager, the method follows with the steps of performing a service interaction management analysis and determining if at least one application should be executed.** If it is determined that at least one application should be executed, the method continues with a step of invoking by the service manager the at least one application via an application-programming interface.

Independent claims 17 and 32 also contain similar limitations.

Deo relates to a service control system for providing real-time call processing services received at a resource complex, e.g., switch or router, physically associated with each of a plurality of distributed service nodes of an intelligent communications network.

Column 18, lines 44 and following of Deo read as follows:

*As shown in FIG. 8, the SLEE 450 is a Java.TM. "virtual machine" designed to execute at least five types of logic programs (objects) implemented in performing call processing services and other supporting services: 1) Feature Discriminator logic programs ("FD") 510, which are functional sub-components of the service control class/service discriminator class 296 (FIG. 7) that first receive a service request from the switching platform, determine which service to perform on a call based on some available criteria, for example, the dialed number of the call, and, then calls on another appropriate Service Logic Program to process the call; 2) the Service Logic Program ("SLP") objects 520, which are functional sub-components of the service control class*

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252 (FIG. 7) that perform service processing for a received service request or event; 3) Line Logic Program ("LLP") objects 530, which are functional sub-components of the call control class 250 (FIG. 7) that maintain the current state of a network access line; 4) Event Logic Program ("ELP") objects 540, which are functional sub-components of the service control/session manager class 260 (FIG. 7) to which all other logic programs write events; and 5) Call Logic Program ("CLP") objects 545 which are functional sub-components of the service control/connection manager class 302 (FIG. 7) that maintains the state of an entire call by providing a connection point for all other logic programs that are involved in the processing of a call. Each of these logic programs are embodied as a software "objects", preferably written in Java.TM. programming language, that may either be temporarily instantiated or persistent, as will be described. The IDNA/NGIN service control architecture is designed such that these objects are written only once in MOCE/SCE, and may be deployed to a SLEEs on any type of computer and on any type of operating system anywhere in the network. [emphasis added]

Column 35, lines 62-67 are as follows:

*Additionally included in the state model are triggers for instantiating an ELP 540 and sending a service request to a FD 510 as shown in FIG. 18. To instantiate an ELP, the NGS call control component 90 addresses a message to NOS, using a logical name for an ELP, as indicated at step 923, in FIG. 13(a). [emphasis added]*

Column 36, lines 5-21 are as follows:

*The NGS call control component includes this object reference in a service request message that is sent to an FD in the SLEE, as indicated at step 929. Thus, all qualified event data that are generated for the call by any process are written to the instantiated ELP process. Particularly, the service request message is addressed to a logical name for FD; this logical name is translated by the NOS NT component to a physical address for an FD logic program that is running at the same service node on which the call was received. Included in the service request message is the dialed number, ANI, and other data.*

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*Next, as indicated at step 931, the FD uses its feature discrimination table to identify which SLP is to handle the received service request. For example, if the received message is a 18C service request, it is to be handled by the 18C SLP. Table 3 below is an example abbreviated FD table having entries including pointers to various "toll-free", e.g., 1-800, call services. [emphasis added]*

Thus, Deo teaches how, upon reception of a call in a switch, how one service is to be instantiated.

As can be appreciated, Deo does not teach nor suggest to perform a service interaction management analysis to determine if at least one application should be executed upon reception of a first and second triggers.

Therefore, Applicant submits that independent claims 1, 17 and 32 and respective dependent claims 2, 3, 5, 6, 8-11, 14, 15, 19-22, 33, 34 and 37 are patentable in view of Deo.

**Claim rejections – 35 U.S.C § 103(a)**

Claims 4, 7, 12, 13, 18, 23, 24, 35 and 36 are rejected as being unpatentable in view of Deo further in view of Bos et al. (US6,456,857) hereinafter referred to as Bos. The Applicant respectfully traverses the rejection.

As mentioned earlier, Deo does not teach nor suggest to perform a service interaction management analysis to determine if at least one application should be executed upon reception of a first and second triggers. Bos does not either mention any related teachings.

Therefore, Applicant submits that independent claims 1, 17 and 32 and more particularly respective dependent claims 4, 7, 12, 13, 18, 23, 24, 35 and 36 are patentable in view of Deo further in view of Bos.

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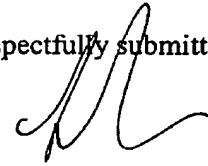
### CONCLUSION

In view of the foregoing, Applicant submits that the application is now in condition for favourable action.

Should the Examiner wish to discuss the present amendment or present patent application, he is invited to contact the undersigned at (514) 345-7900 ext. 2596.

Respectfully submitted,

Dated: April 14, 2005



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